

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

IVAN PARKER

No. 18 CR 495

Judge Sara L. Ellis

GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS

The UNITED STATES OF AMERICA, through JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, respectfully requests that, in addition to the questions posed by the Court during its traditional *voir dire* inquiry of prospective jurors, the Court ask the following additional questions, or variants thereon, to the venire:

1. Other than a traffic ticket, have you, a member of your family, or a close friend ever been arrested, charged, or convicted of any criminal offense? If yes, please indicate: (a) the nature of the offense for which you, your family member, or close friend were arrested or charged; (b) the law enforcement organization responsible for the arrest; (c) the prosecutorial authority responsible for pursuing those charges; and (d) the disposition of those charges.
2. Other than a traffic ticket, have you ever been questioned as part of a criminal investigation by any federal, state, or local law enforcement agency? Have you been inside of a police station? If yes, describe the circumstances.
3. If you have answered "Yes" to Questions One or Two, please state whether this experience might make it difficult for you to fairly and impartially evaluate the evidence and render a fair verdict in this case.
4. Have you, a member of your family, or a close friend had any experience, either favorable or unfavorable, with any federal, state, or local law enforcement agency that would prevent you from being a fair and impartial juror in this case? Are you, a member of your family, or a close friend a member of law enforcement?
5. This case may involve the testimony of witnesses from the Federal Bureau of Investigation. Have you, a member of your family, or a close friend had any

experiences with the FBI, or do you have any feelings regarding the FBI that might make it difficult for you to fairly and impartially evaluate the evidence and render a fair verdict in this case?

6. Have you, a member of your family, or close friend ever been employed by the federal government? If so, please state what the employment was, when and where it occurred, and whether such employment may affect your ability to be fair and impartial in this case.
7. Do you have a family member or close friend who is (or was) a lawyer specializing in criminal law, either as a prosecutor or defense attorney? Is there anything about your relationships with these people that would prevent you from being fair and impartial in this case?
8. Have you ever served on a jury before? If so, what was the nature of the case? When did you serve? Were you the foreperson? Did that jury deliberate and, without telling us the verdict, was the jury able to reach a verdict?
9. Have you, any member of your family, or any close friends ever filed a claim or case against the federal government or had a legal dispute with the federal government? If so, please state the nature of the claim or dispute, any resolution of the matter and when and where the dispute occurred. Was there anything about that claim or case, or the circumstances leading up to it, that left you with bad feelings about the federal government, or would prevent you from being fair and impartial in this case?
10. Do you hold any religious, philosophical, moral, or other beliefs that would make it difficult for you to sit in judgment of another person?
11. At various times during the case, the Court will instruct you about the applicable law. It is your obligation to follow the Court's instructions about the law, whether you agree with the law or not. If you were to find that you disagreed with the law as given to you by this Court, would you nonetheless be able to follow that law and reach a verdict by applying that law to the evidence?
12. Are there any other circumstances that would affect your ability to be a fair and impartial juror in this case?

13. Do you have any difficulties reading or understanding English?

Respectfully Submitted,

JOHN R. LAUSCH, JR.
United States Attorney

By: Christine M. O'Neill
Tobara S. Richardson
Christine M. O'Neill
Assistant United States Attorneys
219 South Dearborn St., 5th Floor
Chicago, Illinois 60604

Dated: September 20, 2019